

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**JULIAN ROSARIO, on behalf of himself and
all others similarly situated.**

Plaintiffs,

v.

**VALENTINE AVENUE DISCOUNT
STORE, CO. INC., et. al.**

Defendants.

10 CIV 05255 (ERK) (LB)

**SUPPLEMENTAL DECLARATION OF
STEPHEN DONALDSON**

Pursuant to 28 U.S.C. § 1746(2), I, Stephen Donaldson, declare under penalty of perjury that foregoing is true and correct:

1. I am an Assistant Project Manager at Garden City Group (“GCG”). The following statements are based on my personal knowledge, information provided by other GCG employees working with me, and as is contained in my files. If called on to do so, I could and would testify competently thereto.

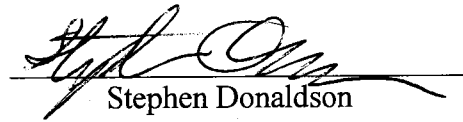
2. GCG is serving as the Claims Administrator in this matter for the purposes of administering the Settlement Agreement, preliminarily approved in the Court’s May 29, 2015 Order. On February 2, 2016, I submitted a Declaration in order to provide the Court and the Parties to this Action with information regarding the dissemination of the “Notice Packets” (including the informational Notice (attached hereto as “Exhibit A”) and the Claim Form (Attached hereto as “Exhibit B”), as well as information regarding the calculation of individual awards.

3. In paragraph nine of my February 2, 2016 Declaration, I advised that GCG had at the time received five valid Opt-Out forms from individuals wishing to be excluded from the Settlement in this matter. I further advised that Defendants' counsel has informed GCG that we should expect to receive rescissions for all five of these individuals. Those individuals were Eli Mineh, Abdallah Seidu, Paulina Cepeda, Chatram Persaud, and Iris M. Mirabel.

4. On February 4, 2016, I received written notice from all five of the above-named individuals expressing their desire to rescind their requests to be excluded from the Settlement and stating that each individual does not wish to receive payment from the settlement fund. Those notices, signed by each of the five Settlement Class Members, are attached hereto as Exhibit A.

I hereby declare under penalty of perjury that the foregoing is true and correct according to my personal knowledge, and if called as a witness, I could and would testify truthfully thereto.

Dated: February 5, 2016


Stephen Donaldson